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**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

REBECCA GASCA, an individual,  
  
 Plaintiff,  
 vs.

**Case. No.:** 3:22-cv-00238-MMD-CSD

**STIPULATION AND ORDER TO  
 WITHDRAW MOTIONS TO  
 DISMISS AND AMEND  
 COMPLAINT, AMEND  
 COMPLAINT, AND STAY CASE  
 DEADLINES PENDING  
 SETTLEMENT AND MEDIATION**

CITY OF RENO, Nevada, a Municipal  
 Corporation; WASHOE COUNTY  
 SHERIFF'S OFFICE, a Municipal  
 Corporation; DOUGLAS COUNTY  
 SHERIFF'S OFFICE, a Municipal  
 Corporation; JASON SOTO, in his  
 individual capacity; DARIN BALAAM, in  
 his individual capacity; DANIEL  
 COVERLEY, in his individual capacity;  
 DOES I – X,  
  
 Defendants.

Plaintiff Rebecca Gasca ("Plaintiff"), by and through her attorneys of record,  
 McLeatchie Law Group, PLLC and Defendants, Washoe County Sheriff's Office and Darin  
 Balaam (the "Washoe Defendants"), by and through their attorney of record, Michael W.  
 Large with Deputy District Attorney's Office; Defendants City of Reno and Jason Soto (the  
 "Reno Defendants"), by and through their attorney of record, William E. Cooper with Deputy  
 City Attorney's Office; and Defendants Douglas County Sheriff's Office and Daniel  
 Coverley (the "Douglas Defendants"), by and through their attorney of record, Katherine F.

Parks with Thorndal Armstrong Delk Balkenbush & Eisinger (collectively “Defendants”) (Plaintiff and Defendants collectively “Parties”), hereby stipulate as follows:

**WHEREAS:**

1. On July 14, 2022, Plaintiff filed her First Amended Complaint (ECF No. 11);

2. On September 9, 2022, Plaintiff filed her Motion for Leave to Amend her First Amended Complaint (ECF No. 26);

3. On September 15, 2022, The Court granted the parties’ Stipulation and Order to Extend Discovery Order Deadlines) (ECF No. 18) extending, among other dates, the Discovery Cut-Off date to February 13, 2023, and the deadline for the Joint Pretrial Order to April 14, 2023;

4. On September 19, 2022, the Parties filed a [Proposed] Stipulated Protective Order (ECF No. 32) which is still pending<sup>1</sup>;

5. The Parties have been meeting and conferring in good faith and have exchanged limited discovery;

6. Plaintiff and the Reno Defendants have agreed to go to mediation in an effort to resolve Ms. Gasca’s claims against the Reno Defendants and other potential parties associated with the City of Reno that Ms. Gasca may seek claims against;

7. Plaintiff and the Washoe Defendants agreed to settlement and are in the process of executing settlement documents;

8. Plaintiff and the Douglas Defendants have reached a tentative resolution of Plaintiff’s claims against the Douglas Defendants;

9. Plaintiff and the Reno Defendants have agreed the case deadlines in this matter should be stayed pending mediation in an effort to limit attorneys’ fees and court resources and to further the likelihood of potential resolution.

<sup>1</sup> The Parties hereby request that the Court approve the Stipulated Protective Order be entered to facilitate the exchange of confidential material that will advance potential resolution between Plaintiff and the Reno Defendants.

**STIPULATION**

10. Accordingly, based on the Parties' good faith desire to attempt resolving this entire matter via settlement and/or mediation and as indicated by signature of counsel below, all Parties hereby stipulate to:

a. Stay all current deadlines set forth in the Stipulation and Order to Extend Discovery Order Deadlines (ECF No. 18) pending mediation.

b. Withdrawal of the pending Motion to Dismiss filed by Defendants Washoe County Sheriff's Office and Darin Balaam (ECF No. 16) and the Joinder thereto filed by Defendants Douglas County Sheriff's Office and Daniel Coverley (ECF No. 22) as moot;

c. Withdrawal of Plaintiff's pending Motion for Leave to Amend (ECF. No. 26).

11. Plaintiff and the Reno Defendants also stipulate that Plaintiff may file a new Second Amended Complaint: (a) removing Defendants Washoe County Sheriff's Office, Darin Balaam, Defendants Douglas County Sheriff's Office, and Daniel Coverley; and (b) including new defendants associated with the City of Reno and related allegations.

12. Plaintiff and the Reno Defendants will file a status report within fifteen (15) days of the completion of mediation.

13. Plaintiff and the Reno Defendants further agree that, in the event mediation is not successful, that an additional stipulation and order to extend deadlines will be necessary (extending the current deadlines by the time the stay is in effect), and will meet and confer regarding the same and lifting the stay of current deadlines within twenty one (21) days of the completion of mediation.

DATED this 11<sup>th</sup> day of October, 2022

DATED this 11<sup>th</sup> day of October, 2022

MCLEATCHIE LAW

RENO CITY ATTORNEY

By: /s/ Margaret A. McLetchie  
Margaret A. McLetchie, Esq.

By: /s/ William E. Cooper  
KARL S. HALL

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*Attorneys for Defendants City of Reno  
and Jason Soto*

DATED this 11<sup>th</sup> day of October, 2022

DATED this 11<sup>th</sup> day of October, 2022

THORNDAL ARMSTRONG DELK  
BALKENBUSH & EISINGER

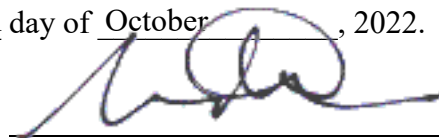
WASHOE COUNTY DISTRICT  
ATTORNEY

By: /s/ Katherine F. Parks  
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*Attorneys for Defendants Washoe  
County Sheriff's Office and Darin  
Balaam*

**ORDER**

IT IS SO ORDERED this 12th day of October, 2022.



UNITED STATES DISTRICT COURT JUDGE